

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-----------------------------|---|-----------------------|
| JO LOUISE PADAL, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 08 C 892 |
| |) | Judge Guzman |
| INGRAM ENTERTAINMENT, INC., |) | Magistrate Judge Keys |
| |) | |
| Defendant. |) | |

**DEFENDANT’S AGREED MOTION FOR AN EXTENSION OF TIME WITHIN
WHICH TO FILE ITS ANSWER OR OTHER RESPONSIVE PLEADING**

NOW COMES Defendant, Ingram Entertainment, Inc., by and through its attorneys, and requests that this Honorable Court allow it an additional thirty (30) days, to and including April 24, 2008, within which to file its answer or other responsive pleading in this case. In support of its Motion, Defendant states as follows:

1. Plaintiff, Jo Louise Padal, has filed a two-count Complaint against Defendant alleging that she was terminated in violation of the Americans with Disabilities Act, 42 U.S.C. §12101 *et seq.* (“ADA”) and the Age Discrimination in Employment Act, 29 U.S.C. §621 *et seq.* (“ADEA”).

2. Defendant was served with Plaintiff’s Complaint on March 4, 2008.

3. Defendant’s answer or other responsive pleading in this case is currently due on or before March 25, 2008.

4. Defendant’s counsel, Clifford R. Perry III, first received a copy of Plaintiff’s Complaint on or about March 10, 2008, and will be unable to complete the investigation necessary to respond to the allegations set forth in Plaintiff’s Complaint by March 25, 2008.

5. Defendant therefore respectfully requests an additional thirty (30) days, to and including April 24, 2008, within which to file its answer or other responsive pleading in this case.

6. Defendant has been informed by Plaintiff's counsel that this Honorable Court has set an initial status conference for April 16, 2008 at 9:00 a.m. Defendant therefore additionally requests that the initial status date be postponed by approximately thirty (30) days and to be set on a date of the Court's choosing.

7. Plaintiff has agreed to this Motion.

8. This Motion is not being brought for purposes of delay, and Plaintiff will not be prejudiced if this Motion is granted.

WHEREFORE, Defendant respectfully requests that this Honorable Court allow it an additional thirty (30) days, to and including April 24, 2008, within which to file its answer or other responsive pleading in this case, and respectfully requests that the initial status date of April 16, 2008 be stricken and postponed by approximately thirty (30) days.

Dated: March 12, 2008

Respectfully submitted,

/s/ Clifford R. Perry III

Clifford R. Perry III, One of the Attorneys for
Defendant

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CERTIFICATE OF SERVICE

Clifford R. Perry III, an attorney, hereby certifies that he caused Defendant's Motion for an Extension of Time Within Which to File Its Answer or Other Responsive Pleading, via Electronic Filing, to be served on Jeffrey S. Marks and Terry D. Slaw, through the U.S. District Court, Northern District of Illinois e-filing system, on this 12th day of March 2008, addressed to:

Jeffrey S. Marks
jmarks@ashiflaw.com

Terry D. Slaw
Tds_60062@hotmail.com

/s/ Clifford R. Perry III

Clifford R. Perry III